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11 IN THE UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

2:20-MC-00301-WBS-CKD

14 Plaintiff,

15 v.

16 APPROXIMATELY \$42,687.68 SEIZED
17 FROM WELLS FARGO BANK
18 ACCOUNT NUMBER 320-3742212,

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

19 APPROXIMATELY \$1,840.42 SEIZED
20 FROM WELLS FARGO BANK
21 ACCOUNT NUMBER 517-7263489,

22 APPROXIMATELY \$629.84 SEIZED
23 FROM WELLS FARGO BANK
24 ACCOUNT NUMBER 532-7107099,

25 APPROXIMATELY \$143.04 SEIZED
26 FROM WELLS FARGO BANK
ACCOUNT NUMBER 530-4807349,

APPROXIMATELY \$50.08 SEIZED
FROM WELLS FARGO BANK
ACCOUNT NUMBER 333-4403940, AND

APPROXIMATELY \$16,566.00 IN
U.S. CURRENCY,

Defendants.

It is hereby stipulated by and between the United States of America and potential claimants Pablo Salcedo Jr. and Karina Salcedo ("claimants"), by and through their respective counsel, as follows:

1. On or about September 16, 2020, claimants filed a claim in the administrative forfeiture
2 proceeding with the Federal Bureau of Investigation with respect to the Approximately \$42,687.68 seized
3 from Wells Fargo Bank Account Number 320-3742212, Approximately \$1,840.42 seized from Wells
4 Fargo Bank Account Number 517-7263489, Approximately \$629.84 seized from Wells Fargo Bank
5 Account Number 532-7107099, Approximately \$143.04 seized from Wells Fargo Bank Account Number
6 530-4807349, Approximately \$50.08 seized from Wells Fargo Bank Account Number 333-4403940, and
7 Approximately \$16,566.00 in U.S. Currency, (hereafter “defendant funds”), which were seized on or
8 about June 18, 2020.

9. The Federal Bureau of Investigation has sent the written notice of intent to forfeit required
10 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a
11 claim to the defendant funds under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimants has
12 filed a claim to the defendant funds as required by law in the administrative forfeiture proceeding.

13. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
14 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are
15 subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture
16 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
17 That deadline was December 15, 2020.

18. By Stipulation and Order filed December 15, 2020, the parties stipulated to extend to
19 February 12, 2021, the time in which the United States is required to file a civil complaint for forfeiture
20 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
21 forfeiture.

22. By Stipulation and Order filed February 16, 2021, the parties stipulated to extend to April
23 13, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
24 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

25. By Stipulation and Order filed April 13, 2021, the parties stipulated to extend to June 11,
26 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
27 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

28. By Stipulation and Order filed June 11, 2021, the parties stipulated to extend to July 12,

1 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
2 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

3 8. By Stipulation and Order filed July 13, 2021, the parties stipulated to extend to September
4 10, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
5 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

6 9. By Stipulation and Order filed September 10, 2021, the parties stipulated to extend to
7 October 8, 2021, the time in which the United States is required to file a civil complaint for forfeiture
8 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
9 forfeiture.

10 10. By Stipulation and Order filed October 8, 2021, the parties stipulated to extend to
11 November 8, 2021, the time in which the United States is required to file a civil complaint for forfeiture
12 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
13 forfeiture.

14 11. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
15 to December 8, 2021, the time in which the United States is required to file a civil complaint for
16 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are
17 subject to forfeiture.

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1 12. Accordingly, the parties agree that the deadline by which the United States shall be
2 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment
3 alleging that the defendant funds are subject to forfeiture shall be extended to December 8, 2021.

4 Dated: 11/5/2021

PHILLIP A. TALBERT
Acting United States Attorney

5 By: /s/ Kevin C. Khasigian
6 KEVIN C. KHASIGIAN
7 Assistant U.S. Attorney

8 Dated: 11/5/2021

9 /s/ Melissa Dougherty
10 MELISSA DOUGHERTY
11 Attorney for potential claimants
12 Pablo Salcedo Jr. and Karina Salcedo

13 (Signature authorized by phone)

14 **IT IS SO ORDERED.**

15 Dated: November 8, 2021

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17 WILLIAM B. SHUBB
18 UNITED STATES DISTRICT JUDGE

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